

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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MONET ELIASTAM, et al.,

*Plaintiffs,*

-v-

NBCUNIVERSAL MEDIA, LLC.,

*Defendant.*  
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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 12-15-14

Civil Action No.: 1:13-cv-04634-RLE

**[PROPOSED] ORDER GRANTING PRELIMINARY  
APPROVAL OF CLASS AND COLLECTIVE ACTION SETTLEMENT**

AND NOW, this 15<sup>th</sup> day of December, 2014, upon consideration of Plaintiffs' unopposed Motion for Preliminary Class and Collective Action Settlement Approval, the Court hereby grants the Motion and ORDERS as follows:

1. The Parties' Stipulation of Settlement is preliminarily approved as fair, reasonable and adequate;

2. For settlement purposes only, the following collective action is conditionally certified pursuant to 29 U.S.C. § 216(b), pending final approval of the settlement: all individuals who participated in Unpaid Internships with NBCUniversal Media, LLC, its predecessor, NBC Universal, Inc., and/or its Affiliated Entities, as defined in the Stipulation of Settlement, at any time since February 4, 2011 through the date of this Order.

3. For settlement purposes only, the following Settlement Class is provisionally certified pursuant to Fed. R. Civ. P. 23, pending final approval of the settlement: all individuals who participated in Unpaid Internships with NBCUniversal Media, LLC, its predecessor, NBC Universal, Inc., and/or its Affiliated Entities, as defined in the Stipulation of Settlement, at any time since July 3, 2007 through the date of this Order if they had an unpaid internship in New

York; since February 4, 2010 through the date of this Order if they had an unpaid internship in California; or since February 4, 2011 through the date of this Order if they had an unpaid internship in Connecticut.

4. Outten & Golden LLP is appointed as Class Counsel for the Settlement Class;

5. The proposed Notice Regarding Pendency of Class and Collective Action, including all of its exhibits, is approved, and shall be sent out pursuant to the terms of the Stipulation of Settlement;

6. The Court will conduct a Final Approval Hearing on May 4, 2015 at 10:30 a.m. ~~to~~ to determine the overall fairness of the settlement and to fix the amount of attorneys' fees and costs to Class Counsel and Enhancement Payments to the Class Representatives and Current FLSA Opt-ins. The Final Approval Hearing may be continued without further notice to Class and Collective Action Members.

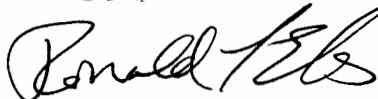
7. Class Counsel shall file their motion for Final Approval and for Attorneys' Fees, Costs, and Enhancement Payments no later than 10 calendar days prior to the Final Approval Hearing; and

8. This Order is not admissible as evidence for any purpose against Defendant or the Releasees (as defined in the Stipulation of Settlement) in any pending or future litigation or arbitration. This Order shall not be cited, construed or used as support for conditional certification or certification, or in opposition to decertification, of any class or collective action. This Order shall not be construed or used as an admission, concession, or declaration by or against Defendant or the Releasees of any fault, wrongdoing, breach, or liability and Defendant and the Releasees specifically deny any such fault, breach, liability, or wrongdoing. This Order shall not be construed or used as an admission, concession, declaration, or waiver by any party of

any arguments, defenses, or claims he, she, or it may have, including, but not limited to, any objections by Defendant or the Releasees to class certification, in the event that the Stipulation of Settlement is terminated. Moreover, the Stipulation of Settlement and any action taken pursuant to the Stipulation of Settlement are for settlement purposes only. Neither the fact of, nor any provision contained in the Stipulation of Settlement or its exhibits, nor any actions taken thereunder, shall be construed as, offered into evidence as, received in evidence as, and/or deemed to be evidence of a presumption, concession, or admission of any kind as to the truth of any fact alleged or validity of any defense that has been, could have been, or in the future might be asserted.

9. Pending final determination of whether the settlement should be approved, and upon expiration of the Notice Response Deadline, as defined in the Stipulation of Settlement, all Class Members who do not timely and validly Opt Out of the Settlement Class, and each of them, and anyone who purports to act on their behalf, shall not maintain, commence or prosecute or pursue either directly, representatively or in any other capacity any Released Claim subsumed and covered by the Releases in Stipulation of Settlement, including in any court or arbitration forum.

**SO ORDERED**

 12-15-14  
**RONALD L. ELLIS U.S.M.J.**

BY THE COURT,

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The Honorable Judge Richard L. Ellis  
United States Magistrate Judge